

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

IN RE REGIONS MORGAN KEEGAN
SECURITIES, DERIVATIVE & ERISA
LITIGATION

No. 09-md-02009-SHM

This Document Relates to:

*In re Regions Morgan Keegan Closed-End
Fund Litigation,*

No. 07-cv-02830-SHM-dkv

**NOTICE OF MOTION OF PLAINTIFFS FOR FINAL APPROVAL
OF PROPOSED SETTLEMENT AND PLAN OF ALLOCATION OF
NET SETTLEMENT FUND AND FOR FINAL CLASS CERTIFICATION**

PLEASE TAKE NOTICE that Lead Plaintiffs Lion Fund, L.P., Dr. J. Samir Sulieman, and Larry Lattimore, on behalf of the Class, and C. Fred Daniels, in his capacity as Trustee *ad Litem* for the Leroy McAbee, Sr. Family Foundation Trust, on behalf of TAL Subclass, will move this Court on April 12, 2013, at 9:30 a.m. or as soon thereafter as counsel may be heard, at Courtroom 2 of the United States District Court for the Western District of Tennessee, Clifford Davis/Odell Horton Federal Building, 167 North Main Street, 11th Floor, Memphis, Tennessee 38013, before the Honorable Samuel H. Mays, Jr., for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, granting final approval to the proposed Settlement of this class action, approving the Plan of Allocation of the Net Settlement Fund, and granting final class certification for purposes of the Settlement.

This motion is premised on the accompanying supporting memorandum of law; the accompanying supporting Declaration of David J. Goldsmith in Support of Plaintiffs' Motion for

Final Approval of Proposed Settlement and Plan of Allocation of Net Settlement Fund and for Final Class Certification and Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses, with annexed exhibits; the Court's January 4, 2013 Order Preliminarily Approving Settlement and Providing for Notice; the Stipulation and Agreement of Settlement dated as of October 12, 2012; and all prior papers and proceedings in this action.

A proposed Final Judgment and Order of Dismissal and a proposed Order Approving Plan of Allocation of Net Settlement Fund are submitted herewith. A Certificate of Consultation made pursuant to Local Rule 7.2(a)(1)(B) is also submitted herewith.

Dated: March 8, 2013

Respectfully submitted,

LABATON SUCHAROW LLP

By: /s/ David J. Goldsmith
Joel H. Bernstein
jbernstein@labaton.com
David J. Goldsmith
dgoldsmith@labaton.com
Nicole M. Zeiss
nzeiss@labaton.com
140 Broadway
New York, New York 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477

*Lead Counsel for Lead Plaintiffs
Lion Fund, L.P., Dr. J. Samir
Suliman and Larry Lattimore*

J. Gerard Stranch, IV (BPR #023045)
gstranch@branstetterlaw.com
BRANSTETTER, STRANCH
& JENNINGS, PLLC
227 Second Avenue North
Nashville, Tennessee 37201
Telephone: (615) 254-8801
Facsimile: (615) 250-3937

Liaison Counsel for Lead Plaintiffs

George S. Trevor
gtrevor@pswplaw.com
PEARSON, SIMON, WARSHAW
& PENNY, LLP
44 Montgomery Street, Suite 2450
San Francisco, California 94104
Telephone: (415) 433-9000
Facsimile: (415) 433-9008

Additional Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2013, I electronically filed the foregoing documents with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following participating CM/ECF participants:

Adam Julien Gana
agana@nbrlawfirm.com

Emily C. Komlossy
ekomlossy@faruqilaw.com

Albert C. Harvey
harveya@thomasonlaw.com

Emily Nicklin
enicklin@kirkland.com

Andrew Berke
andy@berkeattys.com

Ernest Koella
nf@fallsveach.com

Asa R. Danes
asadanes@paulhastings.com

Eugene J. Podesta, Jr.
gpodesta@bakerdonelson.com

B. J. Wade
bwade@gewwlaw.com

Frank L. Watson, III
fwatson@watsonburns.com

Beth A. Keller
bkeller@faruqilaw.com

Harold Naill Falls, Jr.
nf@fallsveach.com

Charles H. Jones, Jr.
fwatson@watsonburns.com

Ira Horowitz
fwatson@watsonburns.com

Christopher Marlborough
cmarlborough@faruqilaw.com

J. Timothy Francis
francis@bham.rr.com

D. Andrew Pietro
pietroda@sullcrom.com

Jeffrey B. Maletta
jeffrey.maletta@klgates.com

Dale H. Tuttle
dtuttle@gewwlaw.com

Jeffrey R. Sonn
jsonn@sonnerez.com

David B. Tulchin
tulchind@sullcrom.com

Jerome A. Broadhurst
jbroadhurst@appersoncrump.com

David E. Swarts
swartsd@sullcrom.com

John A. Cremer
cmb@indylaw.com

Derek W. Loeser
dloeser@kellerrohrback.com

Edge Partners, Ltd.
fwatson@watsonburns.com

Ellen M. Doyle
edoyle@stemberfeinstein.com

Kevin C. Logue
kevinlogue@paulhastings.com

Kristopher S. Ritter
ritterk@kirkland.com

Leo Maurice Bearman , Jr
lbearman@bakerdonelson.com

Marc Jay Bern
mjbern@nbrlawfirm.com

Mark P. Chalos
mchalos@lchb.com

Martin W. Zummach
martin@sparkman-zummach.com

Matthew M. Curley
mcurley@bassberry.com

Michael A. Brady
mbrady@bassberry.com

Michael L. Dagley
mdagley@bassberry.com

Nicole A. Baker
nicole.baker@klgates.com

Peter H. Burke
pburke@bhflegal.com

John B. Veach, III
tv@fallsveach.com

John J. Carey
jcarey@careydanis.com

Kenneth C. Johnston
kjohnston@krel.com

Peter S. Fruin
pfruin@maynardcooper.com

Randall K. Pulliam
rpulliam@cauleybowman.com

Richard A. Lockridge
ralockridge@locklaw.com

Scott L. Adkins
sadkins@sonnerez.com

Scott T. Beall
sbeall@bealllaw.com

Seymour Warren
fwatson@watsonburns.com

Shepherd D. Tate
state@bassberry.com

Steven Lawrence Polk
larry.polk@sutherland.com

Timothy A. Duffy
tduffy@kirkland.com

W. Brantley Phillips, Jr.
bphillips@bassberry.com

/s/ David J. Goldsmith

DAVID J. GOLDSMITH